

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: PAMELA JO CALHOUN	: CHAPTER 13
Debtor	:
	:
LOWER ALLEN TOWNSHIP AUTHORITY	: CASE NO. 1:21-bk-02637
Creditor	:

OBJECTION TO CHAPTER 13 PLAN

AND NOW, comes the Creditor, Lower Allen Township Authority, by and through its Solicitor, Steven P. Miner, Esquire and Caldwell & Kearns, P.C., and objects to the Plan of Debtor, Pamela Jo Calhoun as follows:

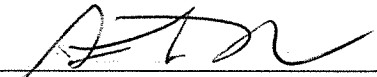
1. Debtor, Pamela Jo Calhoun, filed her Chapter 13 case on or about December 14, 2021;
2. Lower Allen Township Authority filed its Proof of Claim before the Proof of Claim deadline;
3. Lower Allen Township Authority has a secured claim in the amount of \$244.20 which is not provided for in Debtor's Plan.

WHEREFORE, Creditor, Lower Allen Township Authority respectfully requests the Plan Confirmation be denied or an Amended Plan be filed to reflect its interests based on its proof of claim filed in this matter.

Respectfully submitted,

CALDWELL & KEARNS, P.C.

By:



Steven P. Miner, Esquire

Atty ID: 38901

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Solicitor for Creditor, Lower Allen

Township Authority

Date:

1/27/2022

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CERTIFICATE OF SERVICE

I hereby certify that on the below date a true and correct copy of the Objection to Debtor's Plan was served upon the parties by U.S. Mail, first class, postage prepaid, or by electronic means, to the addresses below:

Jack Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Gary J Imblum, Esquire
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

Lower Allen Township Authority
120 Limekiln Road
New Cumberland, PA 17070


Respectfully submitted,

CALDWELL & KEARNS, P. C.

Date:

per 1/27/2022

By:


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